

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

OAKLEY, INC.,

Plaintiff,

v.

ZHANG YIYI, MAOYI, ALTA, WU XING,
JENNY STEWART, XINSHAN, HOUTIAN,
PRISCILLA, MARIE, GEORGINA,
WOXIANGNIMEN,
WOXIANGJIANDANXIAQU, SPENCER,
LIN ZIYAN, LIU DANHUA, LI HUI,
CHENXIN, MOUSE BAI, RUISAN LI,
LUCKLY CHEN, COOLMAN MA, HUANG
GUO ZHEN, WANG PING ZHI,
REGISTRATION PRIVATE, 林彩霞,
RICHARD LEON NOBLE, AMANDA W
JONES, AMBER P CLARK, ART2HOME
CO.,LTD, ELAINE KEITH, SAFIYA
GOOLAMALLEE, HAO LI, LI NING, NINA
ISMET NINA ISMET, RACHEL
WHITELEY, DEBBIE FOWKES, PETER,
SUNIL SHAH, SARA HAMILTON,
NATALIE LITTLEHALES, ANTHONY
WRIGHT, DAN THURSTON, SANDRA
HEWERDINE, PUSHPIINDRADALE,
CHIMA UMUNNAKWE, MARYAM
BARADARAN, TONI OSBORNE,
ANTHONY DIBELLA, MAREK LACKO,
JAMES, WU WANG, CHEN CHENG,
ADRIAN FONTANEZ, LIN MEILIN, LIN,
CHEN JIABING, RSD FDS DSA, LIU
HANCHENG, ZHAOJINYAN,
WENSENGTE, LI LIGUO, TANGSHENG,
HERSEREOP, DRESX, TIAN LIANG,
FDHGSDF DFSGSDF, YANG LIN, XIAO
WU, BEARDEN, DOUGLAS, LINLING,
SUN JIANMIN, TERRY, ROB, ZENG
XIAOQING, DORETHEA GAY,
WWW.JINMI.COM, ALEX AN, JENSEN,
LUO CHENGYU, LIN YI, ZHANG
JIANGONG, ZHUXIANSHEG, LIANG

Case No. 15-cv-5963

Judge Gary Feinerman

Magistrate Judge Young B. Kim

GUANGPU, CHEN QIANG, SONG XIAOYI,)
 LIN JINQING, ZHAOXIN, CAN SU,)
 LAWRENCE BAKER, KOGEL KDD,)
 ZHENG LIBING, WHOISGUARD, INC., LI)
 NANNAN, ZHOU XINGCHI, LUO XIAOBO,)
 QIANG CHEN, TAIBAI LI, FENG ZI,)
 ZHANG HUI MEI, LU XIAOFENG, HU)
 MAOMAO, WU MING, TOMS US, ARTKA)
 CLOTHING, WANG HUA, JOHN GREEN,)
 DE DEDE, WANG JINGCHAO, HUANG ZI,)
 WHOISGUARD, INC., MORRIS B.)
 NUMBERS, WHOISGUARD, INC., LIN PIN,)
 WARD, JOHN, WHOISGUARD, INC.,)
 WHOISGUARD, INC., WHOISGUARD,)
 INC., LIN QINGRONG, LEE, LIU)
 XIANSHENG, CHEN XIAOCHEN,)
 LUXUEQI, ZHOU XINCHE, ZHU ZHI)
 SHAN, HU YU, CHEN LI YUN, WHOIS)
 PRIVACY CORP., WHOIS PRIVACY)
 CORP., LIN XIAO, WHOISGUARD, INC., LI)
 LIANJIE, YANG MING HUA, MARTIN,)
 BRIAN, SHILIRONG, SHILIRONG,)
 LIRONG SHI, ZONG JIAO, LI AO, TONY)
 JIMMY, YI YONG, DASDA, DASDSA,)
 HUANGSHANGWEN, ABC ABC,)
 WHOISGUARD, INC., ZHOU LEI, HUANG)
 SHI ZHONG, CHEN ANTUO, REGISTRANT)
 OF OAKLEYOUTLETSTORES.COM,)
 QIWEIBSK, HARRIS, BRANDI, COCO)
 TINPAY, COCO KISS, CHEN XIAOCHEN,)
 WHOISGUARD, INC., REGISTRANT OF)
 OAKLEYSUNGLASSESOUTLETUSA.COM,)
 FLOWERS, JUSTIN, ALSTON,)
 CHRISTOPHER, WHOISGUARD, INC.,)
 YOUNG, MICHAEL, HE, QI, PUNJANI,)
 PARVEEN, BHATTAN, VIDYA, APPOLON,)
 MARGARETTE, MIRZA, NOMAN, TAN,)
 CONG, MATTHEWS, DAVID CAROL, RAI,)
 CHHAVI, ADAM SAUERMILCH, CHIU,)
 TAIN, FANMENGLU, FAN MENGLU, FU)
 KOU, LIANHUA TANG, NEW VENTURES)
 SERVICES, CORP, COOPER, TRACY,)
 HARJANI, AVINASH, CHUNG, LIAN,)
 PUOJA GTI, WANG YAWEI, TSAI, FAI, FU)
 TA, BI XIANG LIN, CHIN, WU, PATEL,)
 MAHESH, HELLER, ELIZABETH M,)

DOMAINS BY PROXY, LLC, UDDIN,)
 NASEER, BEG, OBAID, JAMAL, RAFAT,)
 CHUNG, LIAN, YIN, SYING, VIJ, MUNISH,)
 ASHRAF, NAVEED, ALI, SYED, BUTT,)
 MIAN, GE XIAO, NEELAM SINGH,)
 NGUYEN OANH, LAN LIN LONG, TU,)
 MENG, DASARI, SRINIVAS ACHYUT,)
 WARAICH, MUHAMMAD, MICHAEL,)
 HENRY, ZHAO YANTAO, SUBHANI,)
 SHAMSA, AHMAD, IJAZ, MALIK,)
 MOHAMMAD, WAHEED, RAUZA,)
 KHADIJA, KANEEZ, KHAN, ABDUL,)
 MASROOR, AUSAF, TSENG, WANG, KHA,)
 FAROQ, MEDLIN, EDNA RENAE, SODHI,)
 DARSHAN, PANDIAN, KARTHIKEYA,)
 STCLAIR, MARY, PENG DENG, SHETH,)
 KEYA, GARCIA, JENNIFER, FINNELL,)
 BRIAN, ENDREDDY, SAIRAM,)
 CLEMENTE, RITALYN, RANGARAJAN,)
 ARUNA, YANG HUI HUANG, BILL JONES,)
 BILLYJANE, AUSTIN, JASON,)
 CHAUDHARY, SONUKUMAR, STAROUT)
 SOFT, KHAN, ASHAR, JIANGJIAXIU, HAO)
 LI, CHERN BAO, YING GU, SCOTT,)
 CODY, VAULT STORE,)
 HUANGYANGHUA, JOBS SPROJECTLLC,)
 HAIFENG LIN, VANCE, MATTHEW, KE,)
 SHING, JR RICHARD KING, GAJERA,)
 VALJI, NAZ, TEHMINA, SARAIYA, NIPA,)
 SHMUTZ, NELLY, BHURA, VINITA,)
 SHAH, SHRADDHA, SHEIKH, ALTAF,)
 KHAN, MASOODA, CHU WENPING,)
 PANZERUI, BDMAOYI, WHOISGUARD,)
 INC., HAN CAI, SALEJI, IRSHAD,)
 HIRPARA, DIVYESH, ANG, MOFA,)
 GORDEN ZAT, ZHANGJUNGUO, WEI)
 ZEYU, DHOLAKIYA, DEVLATA, FU)
 ZHOU SHI MAO SHENG YOU XIAN GONG)
 SI, HUANG MOU MOU, CHEN LI LI,)
 HUSSEIN, HAMID, JINB BEN, JOHN)
 BROWN, KIRMANI, SYED, ROBINSON,)
 GABRIEL, QINGLEI WANG, T)
 VELLADURAI, ARUNPRABHU, JOSHI,)
 ANANDIT, MOORE, JEANIE, VALLE,)
 RAFAEL, NORPAL PUAL, CLARK, CHRIS,)
 PRIVACY PROTECTION SERVICE INC)

D/B/A PRIVACYPROTECT.ORG, CHA,)
 JIANGZUO, PATLOLLA, BHAGAT,)
 GONZALEZ, NELSON, SANDERS,)
 WANDA, SAMAD, AYESHA, MONK, GUY,)
 CHENG GANGQIANG, HASSAN, ROSE,)
 ZUO MONG, UFK KSUD, JAWED,)
 MOHAMMED, LAYKSL LAYKSL,)
 HUACHAO CHEN, DAN THURSTON,)
 HAIJU TANG, BROWN, RHONDA,)
 FRANKLIN, KRISTEN, HIRANI, ZARA,)
 KATYAL, SANDEEP, ABBAS, FAIZ,)
 PAREKH, RAJEN, ZAHEER, KHALID, TOM)
 NI, PATEL, BHAVIK, DISTANT LOVE,)
 ZHONG MEIJIN, SHAFFER, JOHN, PVNRI)
 YOYO, HUANG JIA, WUWANG,)
 WENYUANZHANG, ANNAJOR, KHALID,)
 NADEEM, CEDRIC ZOOSSENS, ZHAN,)
 BINGDUAN, LUDWIG RHYS, BEI LING,)
 LUDWIG RHYS, JING BEN ZHENG,)
 WENBEN ZHANG, DAN RHYS, DAN)
 THURSTON, TENG ZHANG, XINQIAN)
 WEN, LI LIN, LUDWIG RHYS, XINQIAN)
 ZHANG, JASON THURSTON, LUDWIG)
 RHYS, TENG LIN, WENBEN ZHOU,)
 WENBEN RHYS, XINQIAN TYNDALL,)
 XINQIAN TYNDALL, HUACHAO)
 TYNDALL, LUDWIG RHYS, XINQIAN)
 TYNDALL, XINQIAN TYNDALL,)
 XINQIAN RHYS, XINQIAN RHYS,)
 XINQIAN RHYS, XINQIAN TYNDALL, BEI)
 PING, PING GUO REN, SAINI, KAJAL,)
 KING, JAMES, PATE, JAY, CHI, ZUOQUE,)
 HELLER, ELIZABETH, WEN BEN ZHOU,)
 KHAN, TAHIR AMJAT, PATEL, MAHESH,)
 BECKER, RANDY, ROBERTSON, ANNA,)
 WHOISGUARD, INC., HUANG QIAN, B.,)
 HITEN, SHETH, HIMANSHU, ANNA FOX,)
 PATEL, INDIRA, SONYVILLA, SABAU,)
 AWAN, SHEHZAD, DOSHI, TEJAL,)
 KOLSAWALLA, GULSHAN, YUANKAI)
 OU, BOWEN HUANG, LUCKLY CAI,)
 MOUSE BAI, SAGHIR, MOHAMMAD,)
 HYLTON, KENNETH, BUDHWANI,)
 IMRAN, KENT JOHNSON, KEIN JHN,)
 WHOISGUARD, INC., REED, JEANNE,)
 XIAO ZHANG, LIU BAI, STACY TUOHY,)

HOU, TAIN, HANHAN, LOPEZ, MARISOL,)
 FU, FENG, YIN, YUL, SHEIKH,)
 MEHJABEEN, LIU SHANG, CHA JIANJUN,)
 BLACK, REBECCA, PHILLIPS, CLAUDIA,)
 LEE, ANDREW, SUNDY MARK, XIA MEN)
 YANG HAO MAO YI YOU XIAN GONG SI,)
 AMANULA, IMRAN, CHIA, CHUNG,)
 EVERETT, DWIGHT, FEI ZHOU, BIXIANG)
 LIN, BIRANE SY, LINTON, REBECCA,)
 YANG FANGJIANG, LOPEZ, CHRIS,)
 KAHLOON, ARSLAN, SUSU SUSU,)
 YONGYUAN KUANG, ANSARI,)
 WAJEEHA, FOGEDD JIN, WANG XIU)
 RONG, XIA QING, SARBJIT SANDHU,)
 DAVIS, SUSAN, VAKIL, FAHIM, FEI REN,)
 GONZALES, DONALD, EQWJO JKEWKN,)
 CARTER, JUSTIN, MANSOOR, RISHAD,)
 XIAYU ZHI, WILLIAMS, PAM, ZHAO)
 LITAO, JIANG LING, PREMJI, NASH,)
 INTERNET DOMAIN ADMINISTRATOR,)
 AJINKYA KIRLOS, RATHOD,)
 JORAVARSING, SHEIKH, MAHNAZ,)
 SHAN BA, BROWN, JENNIFER, GADE,)
 JIVAN, VILLEGAS, BRENDA,)
 MOHAMMAD, SALEEM, KAUR,)
 SUKHVINDER, HERNANDEZ, KATRINA,)
 IQBAL, ZAFAR, TAHSEEN, MOHAMMAD,)
 PATIL, DHAWAL, HASSAN, ANEES,)
 BARBARA DALLASTA, NASIM, HAIDER,)
 CUI QUANJIAN, CUIQUANJIAN, CUI)
 QUANJIAN, FU ZHOU SHI HUA CHEN)
 YOU XIAN GONG SI, SI MAN, JIANFU)
 HUANG, PRACHA, SHAHINA, ZAHID,)
 ABDUL, XI LIN, H INTEL, ESCOBAR,)
 AMY, SOTO, CHARLES, LUNG, YUE YOU,)
 KOCHAR, MANPREET, LEKTSOK,)
 THUPTEN, RENAWALA, POOJA, MALIK,)
 MUNAWAR, TOWNSEND, SARAH, TSOU,)
 GUO, SONEJI, JAYESH, CHOWDHURY,)
 LUBNA, BEG, ZAHIDA, PAUL, VISHESH,)
 DHALLI, SHAHID, HALL, NICHOLAS,)
 PATTERSON, MARY, BISHOP, TRACY,)
 MALONE, KEVIN, CRAWLEY, THOMAS,)
 HUGHES, MELANIE, DOUGLAS, DAMON,)
 BURTON, BILLIE, TAYLOR, JESSICA,)
 BARROW, KEITH, QUAN, XU, BAILEY,)

CHRISTIAN, SYED, FARAH, CHUGHTAI,)
 ADNAN, SHAO, E, GAJARE, NILESH,)
 KENNETH VENTER, PEREZ, JOHANNY,)
 ISMAIL, MUHAMAD, YASMIN,)
 FARZANA, HOFFSE2664, ITEONZHANJ,)
 PATEL, NAMRATA, HSUEH, ON,)
 DANGOL, RAJAN, JANEPENIX, HUANG)
 ZHANG, MARY SPARK, ZHANG WEINA,)
 XIAOHUA ZHANG, HAIHONG ZHANG,)
 PENG, PENG, ZHANG SANSAN, XIALIN)
 CHEN, SYED, SHOEB, LIY LYNN,)
 SPIDERTEL, INC, KUO, KANG, WILSON)
 JOSHUA, SAJID, SAJJAD, SUN XIANG,)
 SHEN, WEI, IQBAL, AFSHAN, CHIEN,)
 HUI, WU, QIANG, TSAI, SHAIMING, ZHI)
 QIAN, SHANGHAI SHANGHAI, CHUNG,)
 CHEN, CHIA, HUAN YUE, ARIF,)
 MUHAMMAD, AKULA, MALLIKARJUN,)
 MALIK, ADNAN, HUANG, YUAN, DODIA,)
 NIRMALA, KAO, CHEN, JOHN)
 WAHLSTROM, CHEN XIAOMIN,)
 GHAFFAR, TARIQ, MENG, YE, QASIM,)
 MOHAMMAD, RAUF, FAISAL, TEMILY,)
 LU, JIN, DALSANIYA, BHUNISHA, SINGH,)
 SHAMSHER, LU, JIAN, SHE, LONG,)
 KATTIL, RAJEEVAN, LEAHJANE, QAZI,)
 SALIM, HAN, LIN, HOLUO POLY,)
 JANECKY06 LI, ANQUF KIUO, BARNES,)
 DEEANN, THOMASON, PAT, BROWN,)
 JENNIFER W, LI HAI, JEN, WU, VBRU)
 POSRE, ABIOLA, ALABA, LIN HONGYU,)
 FIDAI, NAUREEN, RON PEDROLI, LI)
 XIAOYUN, TSOU, WANG, SANDERS,)
 WANDA D, CHAUDHARY, MOHAMMED,)
 MYERS, CHARLES, ATHELLI, MAHESH)
 GOUD, REED, JAKE, HUSAIN, TAUSIF,)
 OLIVIER TODOROVIC, PATIL, DHAWAL,)
 RUPASINGHE, DONA, GERYI WANG,)
 CHAUDHARY, KIRANKUMAR, LANNY)
 CHEN, AHMED, ZAHEER, JONES, JANE,)
 LIJING, SMITH RODERICK, SCOTT, RUTH)
 MORALES, GIORDANO, DAVID,)
 SHARMA, NAKUL, PATEL, ASHOK,)
 JUQIN YOU, FU ZHOU SHI MING MENG)
 YOU XIAN GONG SI, ABDULLAH,)
 EHTISHAM, IMRAN, FHQMTUX,)

RAHMAN, JALEEL, GOTTLIEB, ELLEN,)
 DONNA NATALE, KHAN, RAMISHA,)
 HALL, MARISA, DOMAINS BY PROXY,)
 LLC, WARNER, SUE, BABU, SHUKUR, JU)
 ZHAO, ZHONG CHUN CUN, HJTRQO)
 BHXHJA, XU QUAN, GOYAL, POOJA,)
 ZHONGDING BUSINESS CONSULTING)
 CO., LTD., SALEEM, SUFERA, CHITTURI,)
 RAHUL, JOBAN, YOGI, TANGSHENG,)
 LOPES, ROBERT, LI LI, PATEL, HEMAL,)
 PASHA, ABID, SINGH, SANDEEP, PERKIT,)
 SUMAN, YI YANG GUO JI MAO YI, RAO,)
 GAYATHRI, MADA, PADMA,)
 EZENWUGO, EMEKA, MANSHA,)
 MUHAMMAD, CRUM, KENNETH,)
 SUTHAR, PRANAY, SOLANKI, MITUL,)
 MILLAN, IRENE, SHAHZAD, AMIR,)
 TORRES, REBECCA, LONG XIAOSHAN,)
 MERCHANT, ALI, HASKELL, WILL, YIN,)
 QING, VALEJA, SANTOSH, WHOIS)
 AGENT, YARTHA, SANJEETH, HERR,)
 BARBARA, OKFF EEEE, PATEL, ATUL,)
 ONLINE IMAGE, LING JUOALE, SANNE)
 LIN, XIAN MENG, HUANGRUILIANG,)
 PILGAOKAR, AMIT, AGGARWAL, RAJAT,)
 CHITRE, KASTURI, WEI, CHI, HAQUE,)
 ZAHOOR, SIDDIQUI, JALIL, KUMAR,)
 VIJAY, DUTT, KATIKUTI, BALLAMBAT,)
 PRASHANT, GUPTA, DEBASIS, CHOKSI,)
 SHAIL, ADIL, MUHAMMAD, STOREINC)
 BRAND, OUTLETSALE BRANDINC,)
 COBB, TIFFANY, BAO HENG, SMITH)
 KAYLA, GARCIA, MATTHEW, YANG,)
 SHEN, FANG, SYING, PENDING)
 RENEWAL OR DELETION, SIDDIQ,)
 SOHAIL, KO, NING, LEI, CHEN, CASE,)
 LOUIS, VERMA, RAJ, SUN, CONG, GIBBS,)
 FELICIA, CHERQ HDS, JOBL JOBL, MAI,)
 SYING, KHAN, SHAMIM, PROTECTION)
 PRIVACY, ORGANIZATION,)
 ORGANIZATION, SHILIRONG, ASGAR,)
 NADEEM, ZHANG QING, SUNG, JUN, SEE)
 PRIVACYGUARDIAN.ORG, SEE)
 PRIVACYGUARDIAN.ORG, BLANTON,)
 CHRIS, KOREPURI, SHASHI, SUKE FAN,)
 XI DADA, FU ZHOU QING GONG YOU)

XIAN GONG SI, FU MA, XIANGRONG SHI,)
 SINGH, JITENDER, GARCIA, CHRIS,)
 SAMANTHA ULRICH, JAMAL, QAZI,)
 WRIGHT, PETE, PALMER, LARRY,)
 MEHTA, TAPAN, KAUR, KULBIR,)
 BARKER, JOHNNY, RAJANI, MAHMOOD,)
 PATEL, KALPESH, ARIF, ARSHAD,)
 AFZAL, MOHAMMAD, STAROUT SOFT,)
 ZHANGYIYI, LIUGANG,)
 GONGTENGXINYI, LINXIAOYANG,)
 ZHOU JIE, VERONNEAU FR, LILIANJIE,)
 GUOFU, SUNJIANMIN, FAYBATES,)
 WANGXINCHUAN, HUANGHOZHU,)
 ZHONGHAIGUOJIMAOYI)
 YOUXIANGONGSI, LIHUI, XIAYU,)
 LINYUCHANG, LUCKLYCHEN,)
 WANGYIFEI, HEIER, HUANGSHAN,)
 KHOKHAR, GIGI, BABAR, AAMIR,)
 QUINTANA, PAMELA, FALLON, PAT,)
 JAIN, ANUPAM, FUZHOU EAYSUN)
 NETWORK TECHNOLOGY CO., LTD.,)
 WILLIAMS, LOUIS N, CHAND, ANU,)
 CHOUDHRY, AMJAD, SULTANA,)
 SHAHANA, KAMAL VERCHE, MALIK,)
 NAHID, TAMEZ, STELLA, SARDAR,)
 AHAD, REBECCA EDWARDS, KHATANI,)
 JAWAID, SREERAMBHATLA, NARSIMHA)
 SANDEEP, RAFIQUE, MOHD, SAFDAR,)
 AANAS, HALL, SAM, SINGH, RANVIJAI,)
 AGUERO, ADRIAN, MARIE STEELE,)
 DESAI, KAUSHALKUMAR, QAMAR,)
 NADEEM, KUMAR, DIPAK, WAKAKA,)
 WAI TONG, HARI, MIKE, ANDY)
 JOHNSON, REESE, SONYA, OSHON,)
 VELMA, KHAN, FARHAT, TRAVELER)
 MAOYI, FU ZHOU SHI SHAN YANG YOU)
 XIAN GONG SI, FU ZHOU SHI SHENG SHI)
 YOU XIAN GONG SI, YANG BOJIE,)
 ZHANG XIAN, MALIK, ANWAR, WOODS,)
 SCOTT, DUNCAN, HELEN, DAVIS,)
 CALEB, PATEL, DHURVESH, SHIJIE LI,)
 DSSW DSSW, CHENFEI CHENFEI,)
 RIVERA, ENRIQUE, JACQUES,)
 NORMAND, MA YAN, LEVY, EVAN,)
 CHEN XIAO, COPE NAE, CHAUDHRY,)
 IZHAR, BACHANI, KALYAN, GODSE,)

RAVINDRA, DHILLON, RANBIR,)
 CHOUDHRY, HAARIS, PEREZ, ANNE,)
 BOYCE, JESSICA, 32 12, BRAMLETT,)
 ROBERT, CULMINATION)
 ANTIDISTRIBUTION, PATEL, KRUPAL,)
 SANDOVAL, PHILLIP, XIAOCHEN)
 XIAOCHEN, DENNIS ROBERT, SONI,)
 HARIKRISHNA, KANYIBA, LEWIS, FU)
 ZHOU SHI TIAN CHENG YOU XIAN)
 GONG SI, MARKEN AMMY, MARKEN)
 AMMY, MASOOD, SHAHZAD, FAROOQ,)
 MUHAMMAD, XIANG LU, TONY)
 BOOGIE, TOP KOOO, BANKS, JEFFREY,)
 LIANGYING ZHANG, ELMA, RAJGOPAL,)
 SINHA, SWAPNA, ESTRADA, JOSEPH,)
 CHOUDREY, INAM, ARORA, RAMNEEK,)
 KC, BIJAY, HAQ, MASROOR, JOSHI,)
 ANKIT, LI JIA, ODOM, JUSTIN,)
 RAJARAM, SHYAM, HARRIS,)
 CHRISTINA, MEHROTRA, HITESH,)
 BECKER, RANDY, TAIYOOB, RAFIQU,)
 JASMEET, KHAIRA, CLEMMONS,)
 DEBORAH, POWELL, ERIC L, JIANG)
 SHENGTAO, ELLIS, JOSEPH, TOOR,)
 SATNAM, HSIUNG, YI, YEN, SYING,)
 MEISTER, NOAH, SOOD, ADITI,)
 MOHAMMED, ASGAR, LINGANNAPETA,)
 SREEKANTH, DHARIWAL, HARNIK,)
 MEHTA, HEMANT, DANIEL, FRANK,)
 CHEN, YONG, TSOU, SHAIMING, CHENG,)
 SYING, HAO, LIAN, HSUEH, WAN, CHU,)
 HO, GILLIAM, ERIN, GEORGE, JOHNNY,)
 FU ZHOU SHI WAN PENG YOU XIAN)
 GONG SI, MEAGAN CRUZ, WERNER)
 MAXWELL, DOMAIN PRIVACY SERVICE)
 FBO REGISTRANT, LIN QI, CHEN HUI)
 HUAN, HUANG KAI WEN, WANG ZHI)
 YONG, WANGCHONG, DEBORAH)
 TIMMONS, ANWAR, NASIM, SHAH,)
 SYED, FU QUAN, QUINTANA, TIM, YANG)
 XING, MAOYUEJUAN, MENG SU, CP,)
 NAYAGAM, XIA YU, CHARLA PETTWAY,)
 LIUZHONG, LIN TAO, HUANG)
 JIANCANG, WENYUAN ZHANG, LING)
 LONG, HART, BONNIE, HUMAOMAO,)
 DOTSON HOWARD, DOTSON HOWARD,)

TU XIAOGUANG, AMY BLOOM, SHAH,)
 SADIA, KEITH, STEVE, HAN LOUIS,)
 SINGH, GURPREET, ALI, RAMZAN, NAN)
 REN, SUSUAMERICA SUSUAMERICA,)
 GARRETT, PATRICK, YINSI BAOHU YI)
 KAIQI (HIDDEN BY WHOIS PRIVACY)
 PROTECTION SERVICE), NANFEN SHU,)
 THOMPSON, VICTORIA, SUN, HSIN, HAO)
 DONG, CHU TIAN, ZHUPEIJIE, LI, YUL,)
 NAHAR, ROHIT, HSU, WEI, HUANG,)
 GANG, CANTU, DAVID, CHENFEI)
 CHENFEI, YUAN, CHAN JUAN, XU)
 QUEENIE, TUAN, PENG, HSIA, JIAN,)
 TSENG, JUN, VAIDYA, RAHUL, LIU,)
 CHENG, PATTI BYRD, PATRICIA)
 STRANGE, SANDRA HALL, LIN)
 MNBVCXZ, XIAOLONG WU, ANDY GU,)
 BILL MICHAEL, ATLAS)
 ARCHITECTURAL DESIGNS, JASON)
 JAMES, CHEN XIAOLIN, LI YI, WU)
 HUIHUI, WU YI, JACKER SUSAN, LI)
 FANG, YUN MAO YI YOU XIAN GONG SI,)
 WHOIS PRIVACY CORP., FEISHUANG)
 LIN, LI TIANXU, CHENG YONG,)
 WHOISGUARD, INC., LIN YILIAN, LI)
 NING, LUDWIG HENCH, ANTHONY)
 GARY, KIMI LIN, WING WAH CHERRY)
 CHUN, SEE PRIVACYGUARDIAN.ORG,)
 WANG MING, RAY WANG,)
 INFORMATION PRIVACY PROTECTION)
 SERVICES LIMITED, DEER LERVEL,)
 REGISTRANT OF)
 ONLINEOUTLET.US.COM, ZHANG)
 XIAOXIAO, ZHANG XIAO,)
 BEAUTIFUPEOPLE, EDDIE, ZHANG YI,)
 CLAUDIO PERILLI, GESSON ANDERSON,)
 JS FF, WANG XIAOLI,)
 WANGFANGFANGHEHE, MIRABEL,)
 KAREN SPAULDING, MIRABEL, HOLLIS,)
 LEONA, LONG TAISUI, GWENDOLYN)
 GRISSOM, LISA CHEN, REGISTRANT OF)
 OUTLETSTORE.US.COM, JGHJHGJG,)
 COMPUADD, BRIANGING, HUANZI, HUA)
 SHENG, BOWENMA, WANGHONGYAN,)
 CHEN LI, WANG ZENG, WILLIAM)
 PEKING, PORRAS DANIEL, CSOSO HEN,

ZHOU LONG, ZHOU LONG, FENG ZHOU,
RAO QI, LANNY TYNDALL, XINQIAN)
TYNDALL, BOWEN MA, POKER LI,)
WANG JIANGUO, JESSON LIN, ZHOU)
XIAOMEI, SAWYER LIN, TREY)
JOHNSON, HUANG BI QING, TENTXUNG)
YOUXIAN GONGSI, CHEN XIN,)
YANGDONGYI, HE JIYUN, REGISTRANT)
OF OAKLEYONLINE.US.COM,)
HUANGXIAODE, PRIVATE PROTECTION)
CO.LTD., BJTT, PAN XIU, ZARELLA,)
ANCHALEE FRANZWA, ANDR  )
B  HME, KEMMEGNE, PITA, JENNA)
MAHAN, DANIELLE NY, YAN YUAN,)
MELCHERS GEORGE, DEBORAH)
LINDLEY, WANG LEXING, LUO YANG,)
LIU XINJIA, LIN YU CHANG, LUO YANG,)
HU LINSHAN, HU LINSHAN, YANFEI,)
AMI CAI'S STORE, BEAUTIFUL 0505,)
BRAND GLASSES OUTLETS, CAMERA)
CASE BAG, CARBANG, CLOTHING)
ACCESSORIES WHOLESALE MARKET,)
CRAZY SPORT OF KING, EGOSUMME)
FASHION CLOTHING STORE,)
EGOSUMME FASHION CLOTHING)
STORE, ENJOY THE DAY, EUROPE)
STYLE BRAND GLASSES DISTRICT, F&S)
GLASSES LTD, FASHION ROSHE RUNING)
SHOES STORE, FASHION SUNGLASSES)
STORE, FASHION SUPERMARKETS NO1,)
FASION APPEARANCE, FAST FASHION)
ONLINE(WHOLESALE&RETAILS), FAT)
DRAGON, FEI TIAN SIMPLE SHOP,)
FISHFOOD, FUNNY6631, GOLDEN TRUST)
TECHNOLOGY CO.,LTD, HATLAND,)
HEY! GROCERY STORE, HONEST AND)
TRUSTWORTHY, HUANYU)
INTERNATIONAL TRADE COMPANY,)
INTERNATIONAL PROFESSIONAL)
OUTDOOR STORE, JIANG ACCESSORIES,)
JOYFUL WAY TRADING LTD., JUNIE B.)
LIU, LEN CYCLING OUTDOOR, LULU)
FIRST STORE, MIAMI, MLZE FASHION)
CLOTHES, MR BLUE, ONLINE STORE)
111415, ONLINE STORE 639339, ONLINE)
STORE 806315, ORION, OUTDOOR)

ACCESSORIES SOLUTION, OUTDOOR)
SPORTS OUTLET--ESHINE GLOBAL)
COMPANY LIMITED, OUTDOOR YOGO)
FITNESS, PP, SATCUS INDUSTRY CO.,)
LIMITED, SE BANANA, STORMAGE)
SPORTS STORE, SUNLITE OUTDOORS)
POWERSPORTS, THE PACIFIC SHOPPING)
MALL, THE XING RUI OUTDOOR, TOOK)
STORE, TOOUTSKY, WARGAME)
EQUIPMENT, WESHOW THE NOVELTY,)
WESHOW THE NOVELTY, Y&C)
SUNGLASSES, YL WARM FAMILY, AISI)
HAIR SHOP, HELLO MR., ALFA)
SUNGLASSES FLAGSHIP STORE, NICE)
LIVE, CL5138, SAMMY_LJG82,)
YUKILOVEKOB, AFERNAND,)
AYAPVBBZ, BIANBIANBIAN,)
CHINAREDBULL, DULILI, HANLINN,)
HAOYUNLAI7858, HKYUN98,)
HONGHAIZI, HOTBUYGIFT,)
HUOFENGHUANG, JINCANCAN2015188,)
KATHERINE2015, LIANSHANGNIDEMEI,)
MADAOCHENG GONG2015,)
PERFECTSUNGLASSES, QINGCHUNPAI,)
SHIJIE168, TIANLONGHAO, TIANXIED2,)
WEIADGE, XINJIANGX2015, XIXI001,)
YANGNIANDA8, YUXUAN869,)
ZHIQIANG2015, and ZHU9,)
)
Defendants.)
)

AMENDED COMPLAINT

Plaintiff Oakley, Inc. (“Oakley”) hereby brings the present action against ZHANG YIYI, MAOYI, ALTA, WU XING, JENNY STEWART, XINSHAN, HOUTIAN, PRISCILLA, MARIE, GEORGINA, WOXIANGNIMEN, WOXIANGJIANDANXIAQU, SPENCER, LIN ZIYAN, LIU DANHUA, LI HUI, CHENXIN, MOUSE BAI, RUISAN LI, LUCKLY CHEN, COOLMAN MA, HUANG GUO ZHEN, WANG PING ZHI, REGISTRATION PRIVATE, 林彩霞, RICHARD LEON NOBLE, AMANDA W JONES, AMBER P CLARK, ART2HOME

CO.,LTD, ELAINE KEITH, SAFIYA GOOLAMALLEE, HAO LI, LI NING, NINA ISMET
NINA ISMET, RACHEL WHITELEY, DEBBIE FOWKES, PETER, SUNIL SHAH, SARA
HAMILTON, NATALIE LITTLEHALES, ANTHONY WRIGHT, DAN THURSTON,
SANDRA HEWERDINE, PUSHPINDRADE, CHIMA UMUNNAKWE, MARYAM
BARADARAN, TONI OSBORNE, ANTHONY DIBELLA, MAREK LACKO, JAMES, WU
WANG, CHEN CHENG, ADRIAN FONTANEZ, LIN MEILIN, LIN, CHEN JIABING, RSD
FDS DSA, LIU HANCHENG, ZHAOJINYAN, WENSENGTE, LI LIGUO, TANGSHENG,
HERSEREOP, DRESX, TIAN LIANG, FDHGSDF DFSGSDF, YANG LIN, XIAO WU,
BEARDEN, DOUGLAS, LINLING, SUN JIANMIN, TERRY, ROB, ZENG XIAOQING,
DORETHEA GAY, WWW.JINMI.COM, ALEX AN, JENSEN, LUO CHENGYU, LIN YI,
ZHANG JIANGONG, ZHUXIANSHENG, LIANG GUANGPU, CHEN QIANG, SONG
XIAOYI, LIN JINQING, ZHAOXIN, CAN SU, LAWRENCE BAKER, KOGEL KDD, ZHENG
LIBING, WHOISGUARD, INC., LI NANNAN, ZHOU XINGCHI, LUO XIAOBO, QIANG
CHEN, TAIBAI LI, FENG ZI, ZHANG HUI MEI, LU XIAOFENG, HU MAOMAO, WU
MING, TOMS US, ARTKA CLOTHING, WANG HUA, JOHN GREEN, DE DEDE, WANG
JINGCHAO, HUANG ZI, WHOISGUARD, INC., MORRIS B. NUMBERS, WHOISGUARD,
INC., LIN PIN, WARD, JOHN, WHOISGUARD, INC., WHOISGUARD, INC.,
WHOISGUARD, INC., LIN QINGRONG, LEE, LIU XIANSHENG, CHEN XIAOCHEN,
LUXUEQI, ZHOU XINCHE, ZHU ZHI SHAN, HU YU, CHEN LI YUN, WHOIS PRIVACY
CORP., WHOIS PRIVACY CORP., LIN XIAO, WHOISGUARD, INC., LI LIANJIE, YANG
MING HUA, MARTIN, BRIAN, SHILIRONG, SHILIRONG, LIRONG SHI, ZONG JIAO, LI
AO, TONY JIMMY, YI YONG, DASDA, DASDSA, HUANGSHANGWEN, ABC ABC,
WHOISGUARD, INC., ZHOU LEI, HUANG SHI ZHONG, CHEN ANTUO, REGISTRANT

OF OAKLEYOUTLETSTORES.COM, QIWEIBSK, HARRIS, BRANDI, COCO TINPAY, COCO KISS, CHEN XIAOCHEN, WHOISGUARD, INC., REGISTRANT OF OAKLEYSUNGLASSESOUTLETUSA.COM, FLOWERS, JUSTIN, ALSTON, CHRISTOPHER, WHOISGUARD, INC., YOUNG, MICHAEL, HE, QI, PUNJANI, PARVEEN, BHATTAN, VIDYA, APPOLON, MARGARETTE, MIRZA, NOMAN, TAN, CONG, MATTHEWS, DAVID CAROL, RAI, CHHAVI, ADAM SAUERMILCH, CHIU, TAIN, FANMENGLU, FAN MENGLU, FU KOU, LIANHUA TANG, NEW VENTURES SERVICES, CORP, COOPER, TRACY, HARJANI, AVINASH, CHUNG, LIAN, PUOJA GTI, WANG YAWEI, TSAI, FAI, FU TA, BI XIANG LIN, CHIN, WU, PATEL, MAHESH, HELLER, ELIZABETH M, DOMAINS BY PROXY, LLC, UDDIN, NASEER, BEG, OBAID, JAMAL, RAFAT, CHUNG, LIAN, YIN, SYING, VIJ, MUNISH, ASHRAF, NAVEED, ALI, SYED, BUTT, MIAN, GE XIAO, NEELAM SINGH, NGUYEN OANH, LAN LIN LONG, TU, MENG, DASARI, SRINIVAS ACHYUT, WARAICH, MUHAMMAD, MICHAEL, HENRY, ZHAO YANTAO, SUBHANI, SHAMSA, AHMAD, IJAZ, MALIK, MOHAMMAD, WAHEED, RAUZA, KHADIJA, KANEEZ, KHAN, ABDUL, MASROOR, AUSAF, TSENG, WANG, KHA, FAROQ, MEDLIN, EDNA RENAE, SODHI, DARSHAN, PANDIAN, KARTHIKEYA, STCLAIR, MARY, PENG DENG, SHETH, KEYA, GARCIA, JENNIFER, FINNELL, BRIAN, ENDREDDY, SAIRAM, CLEMENTE, RITALYN, RANGARAJAN, ARUNA, YANG HUI HUANG, BILL JONES, BILLYJANE, AUSTIN, JASON, CHAUDHARY, SONUKUMAR, STAROUT SOFT, KHAN, ASHAR, JIANGJIAXIU, HAO LI, CHERN BAO, YING GU, SCOTT, CODY, VAULT STORE, HUANGYANGHUA, JOBS SPROJECTLLC, HAIFENG LIN, VANCE, MATTHEW, KE, SHING, JR RICHARD KING, GAJERA, VALJI, NAZ, TEHMINA, SARAIYA, NIPA, SHMUTZ, NELLY, BHURA,

VINITA, SHAH, SHRADDHA, SHEIKH, ALTAF, KHAN, MASOODA, CHU WENPING, PANZERUI, BDMAOYI, WHOISGUARD, INC., HAN CAI, SALEJI, IRSHAD, HIRPARA, DIVYESH, ANG, MOFA, GORDEN ZAT, ZHANGJUNGUO, WEI ZEYU, DHOLAKIYA, DEVLATA, FU ZHOU SHI MAO SHENG YOU XIAN GONG SI, HUANG MOU MOU, CHEN LI LI, HUSSEIN, HAMID, JINB BEN, JOHN BROWN, KIRMANI, SYED, ROBINSON, GABRIEL, QINGLEI WANG, T VELLADURAI, ARUNPRABHU, JOSHI, ANANDIT, MOORE, JEANIE, VALLE, RAFAEL, NORPAL PUAL, CLARK, CHRIS, PRIVACY PROTECTION SERVICE INC D/B/A PRIVACYPROTECT.ORG, CHA, JIANGZUO, PATLOLLA, BHAGAT, GONZALEZ, NELSON, SANDERS, WANDA, SAMAD, AYESHA, MONK, GUY, CHENG GANGQIANG, HASSAN, ROSE, ZUO MONG, UFK KSUD, JAWED, MOHAMMED, LAYKSL LAYKSL, HUACHAO CHEN, DAN THURSTON, HAIJU TANG, BROWN, RHONDA, FRANKLIN, KRISTEN, HIRANI, ZARA, KATYAL, SANDEEP, ABBAS, FAIZ, PAREKH, RAJEN, ZAHEER, KHALID, TOM NI, PATEL, BHAVIK, DISTANT LOVE, ZHONG MEIJIN, SHAFFER, JOHN, PVNRI YOYO, HUANG JIA, WUWANG, WENYUANZHANG, ANNAJOR, KHALID, NADEEM, CEDRIC ZOOSSENS, ZHAN, BINGDUAN, LUDWIG RHYS, BEI LING, LUDWIG RHYS, JING BEN ZHENG, WENBEN ZHANG, DAN RHYS, DAN THURSTON, TENG ZHANG, XINQIAN WEN, LI LIN, LUDWIG RHYS, XINQIAN ZHANG, JASON THURSTON, LUDWIG RHYS, TENG LIN, WENBEN ZHOU, WENBEN RHYS, XINQIAN TYNDALL, XINQIAN TYNDALL, HUACHAO TYNDALL, LUDWIG RHYS, XINQIAN TYNDALL, XINQIAN TYNDALL, XINQIAN RHYS, XINQIAN RHYS, XINQIAN RHYS, XINQIAN TYNDALL, BEI PING, PING GUO REN, SAINI, KAJAL, KING, JAMES, PATE, JAY, CHI, ZUOQUE, HELLER, ELIZABETH, WEN BEN ZHOU, KHAN, TAHIR AMJAT, PATEL, MAHESH,

BECKER, RANDY, ROBERTSON, ANNA, WHOISGUARD, INC., HUANG QIAN, B., HITEN, SHETH, HIMANSHU, ANNA FOX, PATEL, INDIRA, SONYVILLA, SABAU, AWAN, SHEHZAD, DOSHI, TEJAL, KOLSAWALLA, GULSHAN, YUANKAI OU, BOWEN HUANG, LUCKLY CAI, MOUSE BAI, SAGHIR, MOHAMMAD, HYLTON, KENNETH, BUDHWANI, IMRAN, KENT JOHNSON, KEIN JHN, WHOISGUARD, INC., REED, JEANNE, XIAO ZHANG, LIU BAI, STACY TUOHY, HOU, TAIN, HANHAN, LOPEZ, MARISOL, FU, FENG, YIN, YUL, SHEIKH, MEHJABEEN, LIU SHANG, CHA JIANJUN, BLACK, REBECCA, PHILLIPS, CLAUDIA, LEE, ANDREW, SUNDY MARK, XIA MEN YANG HAO MAO YI YOU XIAN GONG SI, AMANULA, IMRAN, CHIA, CHUNG, EVERETT, DWIGHT, FEI ZHOU, BIXIANG LIN, BIRANE SY, LINTON, REBECCA, YANG FANGJIANG, LOPEZ, CHRIS, KAHLOON, ARSLAN, SUSU SUSU, YONGYUAN KUANG, ANSARI, WAJEEHA, FOGEDD JIN, WANG XIU RONG, XIA QING, SARBJIT SANDHU, DAVIS, SUSAN, VAKIL, FAHIM, FEI REN, GONZALES, DONALD, EQWJO JKEWKN, CARTER, JUSTIN, MANSOOR, RISHAD, XIAYU ZHI, WILLIAMS, PAM, ZHAO LITAO, JIANG LING, PREMJI, NASH, INTERNET DOMAIN ADMINISTRATOR, AJINKYA KIRLOS, RATHOD, JORAVARSING, SHEIKH, MAHNAZ, SHAN BA, BROWN, JENNIFER, GADE, JIVAN, VILLEGAS, BRENDA, MOHAMMAD, SALEEM, KAUR, SUKHVINDER, HERNANDEZ, KATRINA, IQBAL, ZAFAR, TAHSEEN, MOHAMMAD, PATIL, DHAWAL, HASSAN, ANEES, BARBARA DALLASTA, NASIM, HAIDER, CUI QUANJIAN, CUIQUANJIAN, CUI QUANJIAN, FU ZHOU SHI HUA CHEN YOU XIAN GONG SI, SI MAN, JIANFU HUANG, PRACHA, SHAHINA, ZAHID, ABDUL, XI LIN, H INTEL, ESCOBAR, AMY, SOTO, CHARLES, LUNG, YUE YOU, KOCHAR, MANPREET, LEKTSOK, THUPTEN, RENAWALA, POOJA, MALIK, MUNAWAR,

TOWNSEND, SARAH, TSOU, GUO, SONEJI, JAYESH, CHOWDHURY, LUBNA, BEG, ZAHIDA, PAUL, VISHESH, DHALLI, SHAHID, HALL, NICHOLAS, PATTERSON, MARY, BISHOP, TRACY, MALONE, KEVIN, CRAWLEY, THOMAS, HUGHES, MELANIE, DOUGLAS, DAMON, BURTON, BILLIE, TAYLOR, JESSICA, BARROW, KEITH, QUAN, XU, BAILEY, CHRISTIAN, SYED, FARAH, CHUGHTAI, ADNAN, SHAO, E, GAJARE, NILESH, KENNETH VENTER, PEREZ, JOHANNY, ISMAIL, MUHAMAD, YASMIN, FARZANA, HOFFSE2664, ITEONZHANJ, PATEL, NAMRATA, HSUEH, ON, DANGOL, RAJAN, JANEPENIX, HUANG ZHANG, MARY SPARK, ZHANG WEINA, XIAOHUA ZHANG, HAIHONG ZHANG, PENG, PENG, ZHANG SANSAN, XIALIN CHEN, SYED, SHOEB, LIY LYNN, SPIDERTEL, INC, KUO, KANG, WILSON JOSHUA, SAJID, SAJJAD, SUN XIANG, SHEN, WEI, IQBAL, AFSHAN, CHIEN, HUI, WU, QIANG, TSAI, SHAIMING, ZHI QIAN, SHANGHAI SHANGHAI, CHUNG, CHEN, CHIA, HUAN YUE, ARIF, MUHAMMAD, AKULA, MALLIKARJUN, MALIK, ADNAN, HUANG, YUAN, DODIA, NIRMALA, KAO, CHEN, JOHN WAHLSTROM, CHEN XIAOMIN, GHAFAR, TARIQ, MENG, YE, QASIM, MOHAMMAD, RAUF, FAISAL, TEMILY, LU, JIN, DALSANIYA, BHUNISHA, SINGH, SHAMSHER, LU, JIAN, SHE, LONG, KATTIL, RAJEEVAN, LEAHJANE, QAZI, SALIM, HAN, LIN, HOLUO POLY, JANECKY06 LI, ANQUF KIUO, BARNES, DEEANN, THOMASON, PAT, BROWN, JENNIFER W, LI HAI, JEN, WU, VBRU POSRE, ABIOLA, ALABA, LIN HONGYU, FIDAI, NAUREEN, RON PEDROLI, LI XIAOYUN, TSOU, WANG, SANDERS, WANDA D, CHAUDHARY, MOHAMMED, MYERS, CHARLES, ATHELLI, MAHESH GOUD, REED, JAKE, HUSAIN, TAUSIF, OLIVIER TODOROVIC, PATIL, DHAWAL, RUPASINGHE, DONA, GERYI WANG, CHAUDHARY, KIRANKUMAR, LANNY CHEN, AHMED, ZAHEER, JONES,

JANE, LIJING, SMITH RODERICK, SCOTT, RUTH MORALES, GIORDANO, DAVID, SHARMA, NAKUL, PATEL, ASHOK, JUQIN YOU, FU ZHOU SHI MING MENG YOU XIAN GONG SI, ABDULLAH, EHTISHAM, IMRAN, FHQMTUX, RAHMAN, JALEEL, GOTTLIEB, ELLEN, DONNA NATALE, KHAN, RAMISHA, HALL, MARISA, DOMAINS BY PROXY, LLC, WARNER, SUE, BABU, SHUKUR, JU ZHAO, ZHONG CHUN CUN, HJTRQO BHXHJA, XU QUAN, GOYAL, POOJA, ZHONGDING BUSINESS CONSULTING CO., LTD., SALEEM, SUFERA, CHITTURI, RAHUL, JOBAN, YOGI, TANGSHENG, LOPES, ROBERT, LI LI, PATEL, HEMAL, PASHA, ABID, SINGH, SANDEEP, PERKIT, SUMAN, YI YANG GUO JI MAO YI, RAO, GAYATHRI, MADA, PADMA, EZENWUGO, EMEKA, MANSHA, MUHAMMAD, CRUM, KENNETH, SUTHAR, PRANAY, SOLANKI, MITUL, MILLAN, IRENE, SHAHZAD, AMIR, TORRES, REBECCA, LONG XIAOSHAN, MERCHANT, ALI, HASKELL, WILL, YIN, QING, VALEJA, SANTOSH, WHOIS AGENT, YARTHA, SANJEETH, HERR, BARBARA, OKFF EEEE, PATEL, ATUL, ONLINE IMAGE, LING JUOALE, SANNE LIN, XIAN MENG, HUANGRUILIANG, PILGAOKAR, AMIT, AGGARWAL, RAJAT, CHITRE, KASTURI, WEI, CHI, HAQUE, ZAHOOOR, SIDDIQUI, JALIL, KUMAR, VIJAY, DUTT, KATIKUTI, BALLAMBAT, PRASHANT, GUPTA, DEBASIS, CHOKSI, SHAIL, ADIL, MUHAMMAD, STOREINC BRAND, OUTLETSALE BRANDINC, COBB, TIFFANY, BAO HENG, SMITH KAYLA, GARCIA, MATTHEW, YANG, SHEN, FANG, SYING, PENDING RENEWAL OR DELETION, SIDDIQ, SOHAIL, KO, NING, LEI, CHEN, CASE, LOUIS, VERMA, RAJ, SUN, CONG, GIBBS, FELICIA, CHERQ HDS, JOBL JOBL, MAI, SYING, KHAN, SHAMIM, PROTECTION PRIVACY, ORGANIZATION, ORGANIZATION, SHILIRONG, ASGAR, NADEEM, ZHANG QING, SUNG, JUN, SEE PRIVACYGUARDIAN.ORG, SEE PRIVACYGUARDIAN.ORG,

BLANTON, CHRIS, KOREPURI, SHASHI, SUKE FAN, XI DADA, FU ZHOU QING GONG
YOU XIAN GONG SI, FU MA, XIANGRONG SHI, SINGH, JITENDER, GARCIA, CHRIS,
SAMANTHA ULRICH, JAMAL, QAZI, WRIGHT, PETE, PALMER, LARRY, MEHTA,
TAPAN, KAUR, KULBIR, BARKER, JOHNNY, RAJANI, MAHMOOD, PATEL, KALPESH,
ARIF, ARSHAD, AFZAL, MOHAMMAD, STAROUT SOFT, ZHANGYIYI, LIUGANG,
GONGTENGXINYI, LINXIAOYANG, ZHOU JIE, VERONNEAU FR, LILIANJIE, GUOFU,
SUNJIANMIN, FAYBATES, WANGXINCHUAN, HUANGHOZHU,
ZHONGHAIGUOJIMAOYI YOUXIANGONGSI, LIHUI, XIAYU, LINYUCHANG,
LUCKLYCHEN, WANGYIFEI, HEIER, HUANGSHAN, KHOKHAR, GIGI, BABAR,
AAMIR, QUINTANA, PAMELA, FALLON, PAT, JAIN, ANUPAM, FUZHOU EAYSUN
NETWORK TECHNOLOGY CO., LTD., WILLIAMS, LOUIS N, CHAND, ANU,
CHOUDHRY, AMJAD, SULTANA, SHAHANA, KAMAL VERCHE, MALIK, NAHID,
TAMEZ, STELLA, SARDAR, AHAD, REBECCA EDWARDS, KHATANI, JAWAID,
SREERAMBHATLA, NARSIMHA SANDEEP, RAFIQUE, MOHD, SAFDAR, AANAS,
HALL, SAM, SINGH, RANVIJAI, AGUERO, ADRIAN, MARIE STEELE, DESAI,
KAUSHALKUMAR, QAMAR, NADEEM, KUMAR, DIPAK, WAKAKA, WAI TONG,
HARI, MIKE, ANDY JOHNSON, REESE, SONYA, OSHON, VELMA, KHAN, FARHAT,
TRAVELER MAOYI, FU ZHOU SHI SHAN YANG YOU XIAN GONG SI, FU ZHOU SHI
SHENG SHI YOU XIAN GONG SI, YANG BOJIE, ZHANG XIAN, MALIK, ANWAR,
WOODS, SCOTT, DUNCAN, HELEN, DAVIS, CALEB, PATEL, DHURVESH, SHIJIE LI,
DSSW DSSW, CHENFEI CHENFEI, RIVERA, ENRIQUE, JACQUES, NORMAND, MA
YAN, LEVY, EVAN, CHEN XIAO, COPE NAE, CHAUDHRY, IZHAR, BACHANI,
KALYAN, GODSE, RAVINDRA, DHILLON, RANBIR, CHOUDHRY, HAARIS, PEREZ,

ANNE, BOYCE, JESSICA, 32 12, BRAMLETT, ROBERT, CULMINATION
ANTIDISTRIBUTION, PATEL, KRUPAL, SANDOVAL, PHILLIP, XIAOCHEN
XIAOCHEN, DENNIS ROBERT, SONI, HARIKRISHNA, KANYIBA, LEWIS, FU ZHOU
SHI TIAN CHENG YOU XIAN GONG SI, MARKEN AMMY, MARKEN AMMY,
MASOOD, SHAHZAD, FAROOQ, MUHAMMAD, XIANG LU, TONY BOOGIE, TOP
KOOO, BANKS, JEFFREY, LIANGYING ZHANG, ELMA, RAJGOPAL, SINHA, SWAPNA,
ESTRADA, JOSEPH, CHOUDREY, INAM, ARORA, RAMNEEK, KC, BIJAY, HAQ,
MASROOR, JOSHI, ANKIT, LI JIA, ODOM, JUSTIN, RAJARAM, SHYAM, HARRIS,
CHRISTINA, MEHROTRA, HITESH, BECKER, RANDY, TAIYOOB, RAFIQU, JASMEET,
KHAIRA, CLEMMONS, DEBORAH, POWELL, ERIC L, JIANG SHENGTAO, ELLIS,
JOSEPH, TOOR, SATNAM, HSIUNG, YI, YEN, SYING, MEISTER, NOAH, SOOD, ADITI,
MOHAMMED, ASGAR, LINGANNAPETA, SREEKANTH, DHARIWAL, HARNIK,
MEHTA, HEMANT, DANIEL, FRANK, CHEN, YONG, TSOU, SHAIMING, CHENG,
SYING, HAO, LIAN, HSUEH, WAN, CHU, HO, GILLIAM, ERIN, GEORGE, JOHNNY, FU
ZHOU SHI WAN PENG YOU XIAN GONG SI, MEAGAN CRUZ, WERNER MAXWELL,
DOMAIN PRIVACY SERVICE FBO REGISTRANT, LIN QI, CHEN HUI HUAN, HUANG
KAI WEN, WANG ZHI YONG, WANGCHONG, DEBORAH TIMMONS, ANWAR, NASIM,
SHAH, SYED, FU QUAN, QUINTANA, TIM, YANG XING, MAOYUEJUAN, MENG SU,
CP, NAYAGAM, XIA YU, CHARLA PETTWAY, LIUZHONG, LIN TAO, HUANG
JIANCANG, WENYUAN ZHANG, LING LONG, HART, BONNIE, HUMAOMAO, DOTSON
HOWARD, DOTSON HOWARD, TU XIAO GUANG, AMY BLOOM, SHAH, SADIA,
KEITH, STEVE, HAN LOUIS, SINGH, GURPREET, ALI, RAMZAN, NAN REN,
SUSUAMERICA SUSUAMERICA, GARRETT, PATRICK, YINSI BAOHU YI KAIQI

(HIDDEN BY WHOIS PRIVACY PROTECTION SERVICE), NANFEN SHU, THOMPSON, VICTORIA, SUN, HSIN, HAO DONG, CHU TIAN, ZHUPEIJIE, LI, YUL, NAHAR, ROHIT, HSU, WEI, HUANG, GANG, CANTU, DAVID, CHENFEI CHENFEI, YUAN, CHAN JUAN, XU QUEENIE, TUAN, PENG, HSIA, JIAN, TSENG, JUN, VAIDYA, RAHUL, LIU, CHENG, PATTI BYRD, PATRICIA STRANGE, SANDRA HALL, LIN MNBVCXZ, XIAOLONG WU, ANDY GU, BILL MICHAEL, ATLAS ARCHITECTURAL DESIGNS, JASON JAMES, CHEN XIAOLIN, LI YI, WU HUIHUI, WU YI, JACKER SUSAN, LI FANG, YUN MAO YI YOU XIAN GONG SI, WHOIS PRIVACY CORP., FEISHUANG LIN, LI TIANXU, CHENG YONG, WHOISGUARD, INC., LIN YILIAN, LI NING, LUDWIG HENCH, ANTHONY GARY, KIMI LIN, WING WAH CHERRY CHUN, SEE PRIVACYGUARDIAN.ORG, WANG MING, RAY WANG, INFORMATION PRIVACY PROTECTION SERVICES LIMITED, DEER LERVEL, REGISTRANT OF ONLINEOUTLET.US.COM, ZHANG XIAOXIAO, ZHANG XIAO, BEAUTIFUPEOPLE, EDDIE, ZHANG YI, CLAUDIO PERILLI, GESSON ANDERSON, JS FF, WANG XIAOLI, WANGFANGFANGHEHE, MIRABEL, KAREN SPAULDING, MIRABEL, HOLLIS, LEONA, LONG TAISUI, GWENDOLYN GRISSOM, LISA CHEN, REGISTRANT OF OUTLETSTORE.US.COM, JGHJHGJG, COMPUADD, BRIANGING, HUANZI, HUA SHENG, BOWENMA, WANGHONGYAN, CHEN LI, WANG ZENG, WILLIAM PEKING, PORRAS DANIEL, CSOSO HEN, ZHOU LONG, ZHOU LONG, FENG ZHOU, RAO QI, LANNY TYNDALL, XINQIAN TYNDALL, BOWEN MA, POKER LI, WANG JIANGUO, JESSON LIN, ZHOU XIAOMEI, SAWYER LIN, TREY JOHNSON, HUANG BI QING, TENTXUNG YOUXIAN GONGSI, CHEN XIN, YANGDONGYI, HE JIYUN, REGISTRANT OF OAKLEYONLINE.US.COM, HUANGXIAODE, PRIVATE PROTECTION CO.LTD., BJTT, PAN XIU, ZARELLA, ANCHALEE FRANZWA, ANDRÃ©

BÄHME, KEMMEGNE, PITA, JENNA MAHAN, DANIELLE NY, YAN YUAN, MELCHERS GEORGE, DEBORAH LINDLEY, WANG LEXING, LUO YANG, LIU XINJIA, LIN YU CHANG, LUO YANG, HU LINSHAN, HU LINSHAN, YANFEI, AMI CAI'S STORE, BEAUTIFUL 0505, BRAND GLASSES OUTLETS, CAMERA CASE BAG, CARBANG, CLOTHING ACCESSORIES WHOLESALE MARKET, CRAZY SPORT OF KING, EGOSUMME FASHION CLOTHING STORE, EGOSUMME FASHION CLOTHING STORE, ENJOY THE DAY, EUROPE STYLE BRAND GLASSES DISTRICT, F&S GLASSES LTD, FASHION ROSHE RUNING SHOES STORE, FASHION SUNGLASSES STORE, FASHION SUPERMARKETS NO1, FASION APPEARANCE, FAST FASHION ONLINE(WHOLESALE&RETAILS), FAT DRAGON, FEI TIAN SIMPLE SHOP, FISHFOOD, FUNNY6631, GOLDEN TRUST TECHNOLOGY CO.,LTD, HATLAND, HEY! GROCERY STORE, HONEST AND TRUSTWORTHY, HUANYU INTERNATIONAL TRADE COMPANY, INTERNATIONAL PROFESSIONAL OUTDOOR STORE, JIANG ACCESSORIES, JOYFUL WAY TRADING LTD., JUNIE B. LIU, LEN CYCLING OUTDOOR, LULU FIRST STORE, MIAMI, MLZE FASHION CLOTHES, MR BLUE, ONLINE STORE 111415, ONLINE STORE 639339, ONLINE STORE 806315, ORION, OUTDOOR ACCESSORIES SOLUTION, OUTDOOR SPORTS OUTLET--ESHINE GLOBAL COMPANY LIMITED, OUTDOOR YOGO FITNESS, PP, SATCUS INDUSTRY CO., LIMITED, SE BANANA, STORMAGE SPORTS STORE, SUNLITE OUTDOORS POWERSPORTS, THE PACIFIC SHOPPING MALL, THE XING RUI OUTDOOR, TOOK STORE, TOOUTSKY, WARGAME EQUIPMENT, WESHOW THE NOVELTY, WESHOW THE NOVELTY, Y&C SUNGLASSES, YL WARM FAMILY, AISI HAIR SHOP, HELLO MR., ALFA SUNGLASSES FLAGSHIP STORE, NICE LIVE, CL5138, SAMMY_LJG82,

YUKILOVEKOBE, AFERNAND, AYAPVBBZ, BIANBIANBIAN, CHINAREDBULL, DULILI, HANLINN, HAOYUNLAI7858, HKYUN98, HONGHAIZI, HOTBUYGIFT, HUOFENGHUANG, JINCANCAN2015188, KATHERINE2015, LIANSHANGNIDEMEI, MADAOCHENGONG2015, PERFECTSUNGLASSES, QINGCHUNPAI, SHIJIE168, TIANLONGHAO, TIANXIED2, WEIADGEGE, XINJIANGX2015, XIXI001, YANGNIANDA8, YUXUAN869, ZHIQIANG2015, and ZHU9, identified on Schedule A attached hereto (collectively, “Defendants”) and alleges as follows:

I. JURISDICTION AND VENUE

1. This Court has original subject matter jurisdiction over the claims in this action pursuant to the provisions of the Lanham Act, 15 U.S.C. § 1051 et seq., 28 U.S.C. § 1338(a)-(b) and 28 U.S.C. § 1331. This Court has jurisdiction over the claims in this action that arise under the laws of the State of Illinois pursuant to 28 U.S.C. § 1367(a), because the state law claims are so related to the federal claims that they form part of the same case or controversy and derive from a common nucleus of operative facts.

2. Venue is proper in this Court pursuant to 28 U.S.C. § 1391, and this Court may properly exercise personal jurisdiction over Defendants since each of the Defendants directly targets business activities toward consumers in the United States, including Illinois, through at least the fully interactive commercial Internet stores operating under the Defendant Domain Names and/or the Online Marketplace Accounts identified in Schedule A attached hereto (collectively, the “Defendant Internet Stores”). Specifically, Defendants are reaching out to do business with Illinois residents by operating one or more commercial, interactive Internet Stores through which Illinois residents can purchase products bearing counterfeit versions of Oakley’s trademarks. Each of the Defendants has targeted sales from Illinois residents by operating online

stores that offer shipping to the United States, including Illinois, accept payment in U.S. dollars and, on information and belief, has sold counterfeit Oakley products to residents of Illinois. Each of the Defendants is committing tortious acts in Illinois, is engaging in interstate commerce, and has wrongfully caused Oakley substantial injury in the State of Illinois.

II. INTRODUCTION

3. This action has been filed by Oakley to combat online counterfeiters who trade upon Oakley's reputation and goodwill by selling and/or offering for sale unauthorized and unlicensed counterfeit products featuring Oakley's trademarks (the "Counterfeit Oakley Products"). The Defendants create the Defendant Internet Stores by the hundreds or even thousands and design them to appear to be selling genuine Oakley products, while actually selling Counterfeit Oakley Products to unknowing consumers. The Defendant Internet Stores share unique identifiers, such as design elements and similarities of the counterfeit products offered for sale, establishing a logical relationship between them and suggesting that Defendants' counterfeiting operation arises out of the same transaction, occurrence, or series of transactions or occurrences. Defendants attempt to avoid liability by going to great lengths to conceal both their identities and the full scope and interworking of their massive counterfeiting operation. Oakley is forced to file these actions to combat Defendants' counterfeiting of its registered trademarks, as well as to protect unknowing consumers from purchasing Counterfeit Oakley Products over the Internet. Oakley has been and continues to be irreparably damaged through consumer confusion, dilution, and tarnishment of its valuable trademarks as a result of Defendants' actions and seeks injunctive and monetary relief.

III. THE PARTIES

Plaintiff

4. Plaintiff Oakley, Inc. is a corporation organized and existing under the laws of the State of Washington, having its principal place of business at One Icon, Foothill Ranch, California 92610.

5. Plaintiff Oakley is an indirect, wholly-owned subsidiary of Luxottica Group S.p.A., a publicly traded company.


6. Oakley is an internationally recognized manufacturer, distributor and retailer of sports eyewear, apparel, footwear, outerwear, jackets, accessories and other merchandise, all of which prominently display its famous, internationally-recognized and federally-registered trademarks, including OAKLEY and various Icon logos (collectively, the “Oakley Products”). Oakley Products have become enormously popular and even iconic, driven by Oakley’s arduous quality standards and innovative design. Among the purchasing public, genuine Oakley Products are instantly recognizable as such. In the United States and around the world, the Oakley brand has come to symbolize high quality, and Oakley Products are among the most recognizable eyewear, headwear, footwear, outerwear, jackets and apparel in the world.





7. Oakley Products are distributed and sold to consumers through retailers throughout the United States, including through authorized retailers in Illinois, the official oakley.com website which was launched in 1995, and Oakley O Stores, including one located at 835 N. Michigan Avenue in Chicago, Illinois.



8. Oakley incorporates a variety of distinctive marks in the design of its various Oakley Products. As a result of its long-standing use, Oakley owns common law trademark rights in its OAKLEY Trademarks. Oakley has also registered its trademarks with the United




States Patent and Trademark Office. Oakley Products typically include at least one of Oakley's registered trademarks. Often several Oakley marks are displayed on a single Oakley Product. Oakley has registered its trademarks with the United States Patent and Trademark Office. Oakley uses its trademarks in connection with the marketing of its Oakley Products, including the following marks which are collectively referred to as the "OAKLEY Trademarks."





Registration No.	Mark	Classes	Date of Registration	Image
1,519,823	OAKLEY	18 Athletic bags.	January 10, 1989	OAKLEY
1,521,599	OAKLEY	9 Sunglasses and accessories for sunglasses, namely, replacement lenses, ear stems and nose pieces.	January 24, 1989	OAKLEY
1,522,692	OAKLEY	25 Clothing, namely, shirts and hats.	January 31, 1989	OAKLEY
1,552,583	OAKLEY	9 Goggles.	August 22, 1989	OAKLEY
2,293,046	OAKLEY	25 Clothing, headwear and footwear and footwear, namely, sport shirts, jerseys, shirts, jackets, vests, sweatshirts, pullovers, coats, ski pants, headwear, caps, shoes, athletic footwear, all purpose sports footwear and socks.	November 16, 1999	OAKLEY
2,409,789	OAKLEY	14 Jewelry and time pieces, namely, watches.	December 5, 2000	OAKLEY
3,153,943	OAKLEY	9 Prescription eyewear, namely, sunglasses and spectacles; eyewear containing electronics devices, namely, protective eyewear, eyeglasses, sunglasses and spectacles; electronics, namely portable digital electronic devices for recording, organizing, and	October 10, 2006	OAKLEY





		reviewing text, data and audio files; computer software for use in recording, organizing, and reviewing text, data and audio files on portable digital electronic devices; transmitters, receivers, speakers and parts thereof for use with cellular, wireless computer and telephone communication systems; communication devices for use on eyewear, namely earpieces, transmitters, receivers, speakers and parts thereof for use with cellular, wireless computer and telephone communication systems; wearable audio visual display, namely, protective eyewear, eyeglasses, sunglasses and spectacles containing an audio visual display; wireless telecommunications modules.		
3,771,517	OAKLEY	35 Retail store services and on-line retail store services featuring eyewear, replacement lenses, eyewear nosepiece kits, clothing, headwear, footwear, watches, decals, electronics devices, posters, athletic bags, handbags, backpacks and luggage.	April 6, 2010	OAKLEY
1,908,414	OAKLEY stylized	16 Printed material, namely decals and stickers.	August 1, 1995	



1,980,039	OAKLEY stylized	9, 25 Protective and/or anti-glare eyewear, namely sunglasses, goggles, spectacles and their parts and accessories, namely replacement lenses, earstems, frames, nose pieces and foam strips; cases specially adapted for protective and/or anti-glare eyewear and their parts and accessories clothing, headwear and footwear, namely T-shirts, sweatshirts, blouses, sweaters, sport shirts, jerseys, shorts, trousers, pants, sweatpants, ski pants, racing pants, jeans, coats, vests, jackets, swimwear, hats, visors, caps, gloves, belts, socks, sandals and shoes.	June 11, 1996	
1,356,297	OAKLEY stylized	9, 25 Goggles, sunglasses, protective pads for elbows, feet and knees. Clothing - namely t-shirts; gloves; racing pants; hats; sweatshirts; sport shirts, jackets, jeans, jerseys and ski pants, jackets, hats, gloves and socks.	August 27, 1985	
1,519,596	OAKLEY stylized	9 Sunglasses and accessories for sunglasses, namely, replacement lenses, ear stems and nose pieces.	January 10, 1989	
3,143,623	OAKLEY stylized	9, 25 Protective eyewear, namely spectacles, prescription eyewear, anti glare glasses and sunglasses and their parts and accessories, namely replacement lenses, frames, earstems, and nose pieces; cases specially adapted for	September 12, 2006	

		<p>spectacles and sunglasses and their parts and accessories</p> <p>Clothing, namely, t-shirts, beach-wear, blouses, sports shirts, jerseys, swimwear, swim trunks, shorts, underwear, shirts, pants, racing pants, ski and snowboard pants and jackets, jeans, vests, jackets, wetsuits, sweaters, pullovers, coats, sweatpants, headwear, namely, hats, caps, visors and footwear, namely wetsuit booties, shoes, sandals, athletic footwear, all purpose sports footwear, thongs and boots.</p>		
1,902,660	OAKLEY and design	16 Printed material, namely decals and stickers.	July 4, 1995	
1,990,262	OAKLEY and design	<p>9, 25 Protective and/or anti-glare eyewear, namely sunglasses, goggles, spectacles and their parts and accessories, namely replacement lenses, earstems, frames, nose pieces and foam strips; cases specially adapted for protective and/or anti-glare eyewear and their parts and accessories</p> <p>clothing, headwear and footwear, namely T-shirts, sweatshirts, blouses, sweaters, sport shirts, jerseys, sweatpants, ski pants, racing pants, jeans, coats, vests, jackets, hats, visors, caps</p>	July 30, 1996	

3,496,633	O	25 clothing, namely, t-shirts, beach-wear, blouses, sports shirts, jerseys, swimwear, swimtrunks, shorts, underwear, shirts, pants, racing pants, ski and snowboard pants and jackets, jeans, vests, jackets, wetsuits, sweaters, pullovers, coats, sweatpants, headwear, namely, hats, caps, visors and footwear, namely, wetsuit booties, shoes, sandals, athletic footwear, all purpose sports footwear, thongs and boots.	September 2, 2008	
2,301,660	O	14 Jewelry and time pieces, namely, watches	December 21, 1999	
3,331,124	O	9, 25 Protective eyewear, namely spectacles, prescription eyewear, anti glare glasses and sunglasses and their parts and accessories, namely replacement lenses, frames, earstems, and nose pieces; cases specially adapted for spectacles and sunglasses and their parts and accessories; and protective clothing, namely, racing pants; Clothing, namely, t-shirts, beach-wear, blouses, sports shirts, jerseys, swimwear, swimtrunks, shorts, underwear, shirts, pants, ski and snowboard pants and jackets, jeans, vests, jackets, wetsuits, sweaters, pullovers, coats, sweatpants, headwear, namely, hats, caps, visors and footwear, namely	November 6, 2007	

		wetsuit booties, shoes, sandals, athletic footwear, all purpose sports footwear, thongs and boots		
3,151,994	O	9 Protective eyewear, namely spectacles, prescription eyewear, anti glare glasses and sunglasses and their parts and accessories, namely replacement lenses, frames, earstems, and nose pieces; cases specially adapted for spectacles and sunglasses and their parts and accessories	October 03, 2006	
3,771,516	O	35 Retail store services and on-line retail store services featuring eyewear, replacement lenses, eyewear nosepiece kits, clothing, headwear, footwear, watches, decals, electronics devices, posters, athletic bags, handbags, backpacks and luggage	April 6, 2010	
3,785,868	O	9 Protective eyewear, namely, spectacles, prescription eyewear, anti glare glasses and sunglasses and their parts and accessories, namely, replacement lenses, frames, earstems, and nose pieces; cases specially adapted for spectacles and sunglasses and their parts and accessories	May 4, 2010	
2,300,245	O	25 clothing, namely, T-shirts, beachwear, blouses, sports shirts, jerseys, shorts, shirts, pants, racing pants, ski pants, vests, jackets, sweaters, pullovers, coats, sweatpants, sweatshirts, headwear, namely, hats,	December 14, 1999	

		caps, and footwear, namely, shoes, athletic footwear, all purpose sports footwear		
2,207,455	O	18 luggage, duffle bags, athletic bags, luggage bags with rollers, wrist mounted carryall bags, tote bags, all purpose sports bags, knapsacks and backpacks	December 1, 1998	
2,209,416	O	9, 25 Protective and/or anti-glare eyewear, namely, goggles, and their parts and accessories, namely, cases specially adapted for protective and/or anti-glare eyewear and their parts and accessories; clothing, headwear and footwear, namely, T-shirts, hats, shorts, shirts, pants, jackets, sweatshirts, shoes, and pullovers		
1,927,106	O	16 printed material, namely decals and stickers	October 17, 1995	
1,984,501	O	9, 25 protective and/or anti-glare eyewear, namely sunglasses, goggles, spectacles and their parts and accessories, namely replacement lenses, earstems, frames, nose pieces and foam strips; cases specially adapted for protective and/or anti-glare eyewear and their parts and accessories; clothing and headwear, namely T-shirts, sweatshirts, jackets, hats, and caps	July 2, 1996	

1,904,181	O	9 protective and/or anti-glare eyewear, namely sunglasses, goggles and their parts and accessories, namely replacement lenses, earstems, frames, nose pieces and foam strips, cases specially adapted for protective and/or anti-glare eyewear and their parts and accessories	July 11, 1995	
3,693,071	O	18 Traveling bags and backpacks	October 6, 2009	

9. The above registrations for the OAKLEY Trademarks are valid, subsisting, in full force and effect, and many are incontestable pursuant to 15 U.S.C. § 1065. The OAKLEY Trademarks have been used exclusively and continuously by Oakley, some since at least as early as 1975, and have never been abandoned. Attached hereto as **Exhibit 1** are true and correct copies of the United States Registration Certificates for the OAKLEY Trademarks included in the above table. The registrations for the OAKLEY Trademarks constitute *prima facie* evidence of their validity and of Oakley's exclusive right to use the OAKLEY Trademarks pursuant to 15 U.S.C. § 1057(b).

10. The OAKLEY Trademarks are exclusive to Oakley, and are displayed extensively on Oakley Products and in Oakley's marketing and promotional materials. Oakley Products have long been among the most popular eyewear in the world and have been extensively promoted and advertised at great expense. In fact, Oakley has expended millions of dollars annually in advertising, promoting and marketing featuring the OAKLEY Trademarks. Oakley Products have also been the subject of extensive unsolicited publicity resulting from their high-

quality, innovative designs and renown as desired luxury items. Because of these and other factors, the Oakley name and the OAKLEY Trademarks have become famous throughout the United States.

11. The OAKLEY Trademarks are distinctive when applied to the Oakley Products, signifying to the purchaser that the products come from Oakley and are manufactured to Oakley's quality standards. Whether Oakley manufactures the products itself or licenses others to do so, Oakley has ensured that products bearing its trademarks are manufactured to the highest quality standards. The OAKLEY Trademarks have achieved tremendous fame and recognition, which has only added to the inherent distinctiveness of the marks. As such, the goodwill associated with the OAKLEY Trademarks is of incalculable and inestimable value to Oakley.

12. Since at least as early as 1995, Oakley has operated a website where it promotes and sells genuine Oakley Products at oakley.com. Sales of Oakley Products via the oakley.com website represent a significant portion of Oakley's business. The oakley.com website features proprietary content, images and designs exclusive to Oakley.

13. Oakley's innovative marketing and product designs have enabled Oakley to achieve widespread recognition and fame and have made the OAKLEY Trademarks some of the most well-known marks in the eyewear and apparel industry. The widespread fame, outstanding reputation, and significant goodwill associated with the Oakley brand have made the OAKLEY Trademarks valuable assets of Oakley.

14. Oakley has expended substantial time, money, and other resources in developing, advertising and otherwise promoting the OAKLEY Trademarks. As a result, products bearing the OAKLEY Trademarks are widely recognized and exclusively associated by consumers, the public, and the trade as being high-quality products sourced from Oakley. Oakley is a multi-

million dollar operation, and Oakley Products have become among the most popular of their kind in the world.

The Defendants

15. Defendants are individuals and business entities who, upon information and belief, reside in the People's Republic of China or other foreign jurisdictions. Defendants conduct business throughout the United States, including within the State of Illinois and this Judicial District, through the operation of the fully interactive commercial websites and online marketplaces operating under the Defendant Internet Stores. Each Defendant targets the United States, including Illinois, and has offered to sell, and, on information and belief, has sold and continues to sell Counterfeit Oakley Products to consumers within the United States, including the State of Illinois.

16. On information and belief, Defendants are an interrelated group of counterfeiters working in active concert to knowingly and willfully manufacture, import, distribute, offer for sale, and sell products bearing counterfeit versions of the OAKLEY Trademarks in the same transaction, occurrence, or series of transactions or occurrences. Tactics used by Defendants to conceal their identities and the full scope of their counterfeiting operation make it virtually impossible for Oakley to learn Defendants' true identities and the exact interworking of their massive counterfeit network. In the event that Defendants provide additional credible information regarding their identities, Oakley will take appropriate steps to amend the Amended Complaint.

IV. DEFENDANTS' UNLAWFUL CONDUCT

17. The success of the Oakley brand has resulted in its significant counterfeiting. Consequently, Oakley has a worldwide anti-counterfeiting program and regularly investigates

suspicious websites and online marketplace listings identified in proactive Internet sweeps and reported by consumers. In recent years, Oakley has identified thousands of domain names linked to fully interactive websites and marketplace listings on platforms such as iOffer and Aliexpress, including the Defendant Internet Stores, which were offering for sale, selling, and importing Counterfeit Oakley Products to consumers in this Judicial District and throughout the United States. Despite Oakley's enforcement efforts online and on the ground, Defendants have persisted in creating the Defendant Internet Stores, which generate massive profits selling Counterfeit Oakley Products. Internet websites like the Defendant Internet Stores are estimated to receive tens of millions of visits per year and to generate over \$135 billion in annual online sales. According to an intellectual property rights seizures statistics report issued by Homeland Security, the manufacturer's suggested retail price (MSRP) of goods seized by the U.S. government in fiscal year 2014 was over \$1.23 billion. Internet websites like the Defendant Internet Stores are also estimated to contribute to tens of thousands of lost jobs for legitimate businesses and broader economic damages such as lost tax revenue every year.

18. Defendants facilitate sales by designing the Defendant Internet Stores so that they appear to unknowing consumers to be authorized online retailers, outlet stores, or wholesalers selling genuine Oakley Products. Many of the Defendant Internet Stores look sophisticated and accept payment in U.S. dollars via credit cards, Western Union and PayPal. Numerous Defendant Domain Names also incorporate the OAKLEY Trademarks into the URL, and the Defendant Internet Stores often include content and design elements that make it very difficult for consumers to distinguish such counterfeit sites from an authorized website. Defendants further perpetuate the illusion of legitimacy by offering "live 24/7" customer service and using indicia of authenticity and security that consumers have come to associate with authorized

retailers, including the McAfee® Security, VeriSign®, Visa®, MasterCard®, and PayPal® logos. Oakley has not licensed or authorized Defendants to use any of the OAKLEY Trademarks, and none of the Defendants are authorized retailers of genuine Oakley Products.

19. Defendants also deceive unknowing consumers by using the OAKLEY Trademarks without authorization within the content, text, and/or meta tags of their websites in order to attract various search engines crawling the Internet looking for websites relevant to consumer searches for Oakley Products. Additionally, upon information and belief, Defendants use other unauthorized search engine optimization (SEO) tactics and social media spamming so that the Defendant Internet Stores listings show up at or near the top of relevant search results and misdirect consumers searching for genuine Oakley Products. Further, Defendants utilize similar illegitimate SEO tactics to propel new domain names to the top of search results after others are shut down. As such, Oakley also seeks to disable Defendant Domain Names owned by Defendants that are the means by which the Defendants could continue to sell Counterfeit Oakley Products.

20. Defendants go to great lengths to conceal their identities and often use multiple fictitious names and addresses to register and operate their massive network of Defendant Internet Stores. For example, many of Defendants' names and physical addresses used to register the Defendant Domain Names are incomplete, contain randomly typed letters, or fail to include cities or states. Other Defendant Domain Names use privacy services that conceal the owners' identity and contact information. On information and belief, Defendants regularly create new websites and online marketplace accounts on various platforms using the identities listed in Schedule A to the Amended Complaint, as well as other unknown fictitious names and addresses. Such Defendant Internet Store registration patterns are one of many common tactics

used by the Defendants to conceal their identities, the full scope and interworking of their massive counterfeiting operation, and to avoid being shut down.

21. Even though Defendants operate under multiple fictitious names, there are numerous similarities among the Defendant Internet Stores. For example, many of the Defendant websites have virtually identical layouts, even though different aliases were used to register the respective domain names. In addition, Counterfeit Oakley Products for sale in the Defendant Internet Stores bear similar irregularities and indicia of being counterfeit to one another, suggesting that the Counterfeit Oakley Products were manufactured by and come from a common source and that Defendants are interrelated. The Defendant Internet Stores also include other notable common features, including use of the same domain name registration patterns, unique shopping cart platforms, accepted payment methods, check-out methods, meta data, illegitimate SEO tactics, HTML user-defined variables, domain redirection, lack of contact information, identically or similarly priced items and volume sales discounts, the same incorrect grammar and misspellings, similar hosting services, similar name servers, and the use of the same text and images, including content copied from Oakley's official oakley.com website.

22. In addition to operating under multiple fictitious names, Defendants in this case and defendants in other similar cases against online counterfeiters use a variety of other common tactics to evade enforcement efforts. For example, counterfeiters like Defendants will often register new domain names or online marketplace accounts under new aliases once they receive notice of a lawsuit. Counterfeiters also often move website hosting to rogue servers located outside the United States once notice of a lawsuit is received. Rogue servers are notorious for ignoring take down demands sent by brand owners. Counterfeiters also typically ship products in small quantities via international mail to minimize detection by U.S. Customs and Border

Protection. A 2012 U.S. Customs and Border Protection report on seizure statistics indicated that the Internet has fueled “explosive growth” in the number of small packages of counterfeit goods shipped through the mail and express carriers.

23. Further, counterfeiters such as Defendants typically operate multiple credit card merchant accounts and PayPal accounts behind layers of payment gateways so that they can continue operation in spite of Oakley’s enforcement efforts. On information and belief, Defendants maintain off-shore bank accounts and regularly move funds from their PayPal accounts to off-shore bank accounts outside the jurisdiction of this Court. Indeed, analysis of PayPal transaction logs from previous similar cases indicates that off-shore counterfeiters regularly move funds from U.S.-based PayPal accounts to China-based bank accounts outside the jurisdiction of this Court.

24. Defendants, without any authorization or license from Oakley, have knowingly and willfully used and continue to use the OAKLEY Trademarks in connection with the advertisement, distribution, offering for sale, and sale of Counterfeit Oakley Products into the United States and Illinois over the Internet. Each Defendant Internet Store offers shipping to the United States, including Illinois and, on information and belief, each Defendant has sold Counterfeit Oakley Products into the United States, including Illinois.

25. Defendants’ use of the OAKLEY Trademarks in connection with the advertising, distribution, offering for sale, and sale of Counterfeit Oakley Products, including the sale of Counterfeit Oakley Products into Illinois, is likely to cause and has caused confusion, mistake, and deception by and among consumers and is irreparably harming Oakley.

COUNT I
TRADEMARK INFRINGEMENT AND COUNTERFEITING (15 U.S.C. § 1114)

26. Oakley re-alleges and incorporates by reference the allegations set forth in paragraphs 1 through 25.

27. This is a trademark infringement action against Defendants based on their unauthorized use in commerce of counterfeit imitations of the registered OAKLEY Trademarks in connection with the sale, offering for sale, distribution, and/or advertising of infringing goods. The OAKLEY Trademarks are highly distinctive marks. Consumers have come to expect the highest quality from Oakley Products sold or marketed under the OAKLEY Trademarks.

28. Defendants have sold, offered to sell, marketed, distributed, and advertised, and are still selling, offering to sell, marketing, distributing, and advertising products bearing counterfeit reproductions of the OAKLEY Trademarks without Oakley's permission.

29. Oakley is the exclusive owner of the OAKLEY Trademarks. Oakley's United States Registrations for the OAKLEY Trademarks (Exhibit 1) are in full force and effect. Upon information and belief, Defendants have knowledge of Oakley's rights in the OAKLEY Trademarks, and are willfully infringing and intentionally using counterfeits of the OAKLEY Trademarks. Defendants' willful, intentional and unauthorized use of the OAKLEY Trademarks is likely to cause and is causing confusion, mistake, and deception as to the origin and quality of the Counterfeit Oakley Products among the general public.

30. Defendants' activities constitute willful trademark infringement and counterfeiting under Section 32 of the Lanham Act, 15 U.S.C. § 1114.

31. Oakley has no adequate remedy at law, and if Defendants' actions are not enjoined, Oakley will continue to suffer irreparable harm to its reputation and the goodwill of its well-known OAKLEY Trademarks.

32. The injuries and damages sustained by Oakley have been directly and proximately caused by Defendants' wrongful reproduction, use, advertisement, promotion, offering to sell, and sale of Counterfeit Oakley Products.

COUNT II
FALSE DESIGNATION OF ORIGIN (15 U.S.C. § 1125(a))

33. Oakley hereby re-alleges and incorporates by reference the allegations set forth in paragraphs 1 through 32.

34. Defendants' promotion, marketing, offering for sale, and sale of Counterfeit Oakley Products has created and is creating a likelihood of confusion, mistake, and deception among the general public as to the affiliation, connection, or association with Oakley or the origin, sponsorship, or approval of Defendants' Counterfeit Oakley Products by Oakley.

35. By using the OAKLEY Trademarks on the Counterfeit Oakley Products, Defendants create a false designation of origin and a misleading representation of fact as to the origin and sponsorship of the Counterfeit Oakley Products.

36. Defendants' false designation of origin and misrepresentation of fact as to the origin and/or sponsorship of the Counterfeit Oakley Products to the general public is a willful violation of Section 43 of the Lanham Act, 15 U.S.C. § 1125.

37. Oakley has no adequate remedy at law and, if Defendants' actions are not enjoined, Oakley will continue to suffer irreparable harm to its reputation and the goodwill of its Oakley brand.

COUNT III
CLAIM FOR INJUNCTIVE RELIEF UNDER THE ANTICYBERSQUATTING
CONSUMER PROTECTION ACT (15 U.S.C. § 1125(d)) AS TO THE DEFENDANTS
OPERATING A DEFENDANT DOMAIN NAME INCORPORATING THE
OAKLEY TRADEMARKS

38. Oakley hereby re-alleges and incorporates by reference the allegations set forth in paragraphs 1 through 37.

39. Oakley is the exclusive owner of the OAKLEY Trademarks. The U.S. Registrations for the OAKLEY Trademarks (Exhibit 1) are in full force and effect. Additionally, the OAKLEY Trademarks are highly distinctive and famous marks pursuant to 15 U.S.C. § 1125 and were famous before and at the time of the registration of the Defendant Domain Names.

40. Upon information and belief, Defendants operating a Defendant Domain Name incorporating the OAKLEY Trademarks have acted with bad faith intent to profit from the unauthorized use of the OAKLEY Trademarks and the goodwill associated therewith by registering, trafficking in, or using various domain names which are identical to, confusingly similar to or dilutive of the OAKLEY Trademarks.

41. Defendants have no intellectual property rights in or to the OAKLEY Trademarks.

42. Defendants' actions constitute willful cybersquatting in violation of §43(d) of the Lanham Act, 15 U.S.C. §1125(d).

43. Oakley has no adequate remedy at law, and the registration and use of the Defendant Domain Names incorporating the OAKLEY Trademarks has caused, is causing, and is likely to continue to cause substantial and irreparable injury to the public and to Oakley.

COUNT IV
VIOLATION OF ILLINOIS UNIFORM DECEPTIVE TRADE PRACTICES ACT
(815 ILCS § 510, *et seq.*)

44. Oakley hereby re-alleges and incorporates by reference the allegations set forth in paragraphs 1 through 43.

45. Defendants have engaged in acts violating Illinois law including, but not limited to, passing off their Counterfeit Oakley Products as those of Oakley, causing a likelihood of confusion and/or misunderstanding as to the source of their goods, causing a likelihood of confusion and/or misunderstanding as to an affiliation, connection, or association with genuine Oakley Products, representing that their products have Oakley's approval when they do not, and engaging in other conduct which creates a likelihood of confusion or misunderstanding among the public.

46. The foregoing Defendants' acts constitute a willful violation of the Illinois Uniform Deceptive Trade Practices Act, 815 ILCS § 510, *et seq.*

47. Oakley has no adequate remedy at law, and Defendants' conduct has caused Oakley to suffer damage to its reputation and goodwill. Unless enjoined by the Court, Oakley will suffer future irreparable harm as a direct result of Defendants' unlawful activities.

PRAYER FOR RELIEF

WHEREFORE, Oakley prays for judgment against Defendants as follows:

- 1) That Defendants, their affiliates, officers, agents, servants, employees, attorneys, confederates, and all persons acting for, with, by, through, under or in active concert with them be temporarily, preliminarily, and permanently enjoined and restrained from:
 - a. using the OAKLEY Trademarks or any reproductions, counterfeit copies or colorable imitations thereof in any manner in connection with the distribution, marketing,

- advertising, offering for sale, or sale of any product that is not a genuine Oakley Product or is not authorized by Oakley to be sold in connection with the OAKLEY Trademarks;
- b. passing off, inducing, or enabling others to sell or pass off any product as a genuine Oakley Product or any other product produced by Oakley, that is not Oakley's or not produced under the authorization, control, or supervision of Oakley and approved by Oakley for sale under the OAKLEY Trademarks;
 - c. committing any acts calculated to cause consumers to believe that Defendants' Counterfeit Oakley Products are those sold under the authorization, control or supervision of Oakley, or are sponsored by, approved by, or otherwise connected with Oakley;
 - d. further infringing the OAKLEY Trademarks and damaging Oakley's goodwill;
 - e. otherwise competing unfairly with Oakley in any manner;
 - f. manufacturing, shipping, delivering, holding for sale, transferring or otherwise moving, storing, distributing, returning, or otherwise disposing of, in any manner, products or inventory not manufactured by or for Oakley, nor authorized by Oakley to be sold or offered for sale, and which bear any Oakley trademark, including the OAKLEY Trademarks, or any reproductions, counterfeit copies or colorable imitations thereof;
 - g. using, linking to, transferring, selling, exercising control over, or otherwise owning the Online Marketplace Accounts, the Defendant Domain Names, or any other domain name or online marketplace account that is being used to sell or is the means by which Defendants could continue to sell Counterfeit Oakley Products; and

- h. operating and/or hosting websites at the Defendant Domain Names and any other domain names registered or operated by Defendants that are involved with the distribution, marketing, advertising, offering for sale, or sale of any product bearing the OAKLEY Trademarks or any reproduction, counterfeit copy or colorable imitation thereof that is not a genuine Oakley Product or not authorized by Oakley to be sold in connection with the OAKLEY Trademarks; and
- 2) That Defendants, within fourteen (14) days after service of judgment with notice of entry thereof upon them, be required to file with the Court and serve upon Oakley a written report under oath setting forth in detail the manner and form in which Defendants have complied with paragraph 1, a through h, above;
- 3) Entry of an Order that, at Oakley's choosing, the registrant of the Defendant Domain Names shall be changed from the current registrant to Oakley, and that the domain name registries for the Defendant Domain Names, including, but not limited to, VeriSign, Inc., Neustar, Inc., Afiliast Limited, CentralNic, Nominet, and the Public Interest Registry, shall unlock and change the registrar of record for the Defendant Domain Names to a registrar of Oakley's selection, and that the domain name registrars take any steps necessary to transfer the Defendant Domain Names to a registrar of Oakley's selection; or that the same domain name registries shall disable the Defendant Domain Names and make them inactive and untransferable;
- 4) Entry of an Order that, upon Oakley's request, those in privity with Defendants and those with notice of the injunction, including any online marketplaces such as iOffer and Alibaba Group Holding Ltd., Alipay.com Co., Ltd. and any related Alibaba entities (collectively, "Alibaba"), social media platforms, Facebook, YouTube, LinkedIn, Twitter, Internet search

engines such as Google, Bing and Yahoo, web hosts for the Defendant Domain Names, and domain name registrars, shall:

- a. disable and cease providing services for any accounts through which Defendants engage in the sale of Counterfeit Oakley Products using the OAKLEY Trademarks, including any accounts associated with the Defendants listed on Schedule A;
 - b. disable and cease displaying any advertisements used by or associated with Defendants in connection with the sale of Counterfeit Oakley Products using the OAKLEY Trademarks; and
 - c. take all steps necessary to prevent links to the Defendant Domain Names identified on Schedule A from displaying in search results, including, but not limited to, removing links to the Defendant Domain Names from any search index; and
- 5) That Defendants account for and pay to Oakley all profits realized by Defendants by reason of Defendants' unlawful acts herein alleged, and that the amount of damages for infringement of the OAKLEY Trademarks be increased by a sum not exceeding three times the amount thereof as provided by 15 U.S.C. § 1117;
 - 6) In the alternative, that Oakley be awarded statutory damages pursuant to 15 U.S.C. § 1117(c)(2) of \$2,000,000 for each and every use of the OAKLEY Trademarks and \$100,000 per domain name incorporating the OAKLEY Trademarks pursuant to 15 U.S.C. § 1117(d);
 - 7) That Oakley be awarded its reasonable attorneys' fees and costs; and
 - 8) Award any and all other relief that this Court deems just and proper.

Dated this 7th day of July 2015.

Respectfully submitted,

/s/ Justin R. Gaudio

Kevin W. Guynn

Amy C. Ziegler

Justin R. Gaudio

Jessica L. Bloodgood

Greer, Burns & Crain, Ltd.

300 South Wacker Drive, Suite 2500

Chicago, Illinois 60606

312.360.0080

312.360.9315 (facsimile)

kguynn@gbclaw.net

aziegler@gbclaw.net

jgaudio@gbclaw.net

jbloodgood@gbclaw.net

Counsel for Plaintiff Oakley, Inc.